

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

INA STEINER, DAVID STEINER, and
STEINER ASSOCIATES, LLC,

Plaintiffs,

v.

EBAY INC., *et al.*,

Defendants.

Civil Action No. 1:21-CV-11181-DPW

NOTICE OF NON-OBJECTION TO DISCOVERY RESPONSES

The United States of America (the “Government”), by and through undersigned counsel, respectfully submits this Notice to update the Court and parties on discovery materials it has received from Defendant eBay. The Government reports as follows:

1. On January 5, 2024, the Court entered a Protective Order, which stated in relevant part that “Plaintiffs may file interrogatories and document requests on Defendants eBay, Wenig Wymer, Jones, and Baugh relating to their knowledge, if any, of Defendant Jim Baugh’s work for the CIA or FBI. The responses shall be disclosed to the Government and filed under seal with the Court. Within 14 days of receipt of the responses, the Government shall inform the Court whether it objects to public disclosure of the responses.” ECF No. 315 ¶ 1(b).

3. On January 24, Defendant eBay produced documents to the Government in response to Plaintiffs’ requests for production. ECF No. 339 ¶ 5. It also filed copies of the documents with the Court by lodging them with a Department of Justice (“DOJ”) Physical Security Specialist. *Id.*

4. On February 7, the Court granted the Government’s Assented to Motion for Extension of Time to File Objections related to the documents produced by Defendant eBay, ECF

No. 343, and ordered the Government to file any objections by February 21. ECF No. 345.

5. The Government has reviewed the documents that Defendant eBay produced and has no objections to the public disclosure of those documents. Accordingly, the Government has informed eBay counsel that they may serve the documents on all parties to this litigation.

Dated: February 16, 2024

Respectfully submitted,

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Civil Division

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/s/ Christopher D. Edelman
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